

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
WESTERN DIVISION**

FRED BECK, et al

PLAINTIFFS

VS.

CAUSE NO.: 3:03CV60-P-D

KOPPERS, INC., et al

DEFENDANTS

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**SEPARATE REPLY OF ILLINOIS CENTRAL RAILROAD TO PLAINTIFF'S  
OPPOSITION TO MOTION TO COMPEL THE COMPLETION OF THE DEPOSITION  
OF JAMES DAHLGREN, M.D.**

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COMES NOW Illinois Central Railroad Company, by and through counsel, and would state unto the Court that this Defendant has had no opportunity whatsoever to question Dr. James Dahlgren, M.D. up to this point. The plaintiff's position that Illinois Central should not be afforded the opportunity to depose Dr. Dahlgren flies in the face of the entire discovery frame work of the Federal Rules of Civil Procedure. In addition, Illinois Central Railroad joins in the Reply filed herein by Koppers and Beazer East, Inc.

Respectfully submitted, this the 12<sup>th</sup> day of July, 2005.

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BY: /s/ Chris Winter  
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**CERTIFICATE OF SERVICE**

I, Chris W. Winter, of counsel to Defendant(s), hereby certify that I have this day mailed with postage prepaid, a true and correct copy of the above and foregoing document unto:

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SO CERTIFIED, this the 12<sup>th</sup> day of July, 2005.

/s/ Chris Winter

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